

# Sundstrand Corporation



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April 19, 1991

FEDERAL EXPRESS AND  
CERTIFIED MAIL/  
RETURN RECEIPT REQUESTED

Ms. Karen Vendl  
U.S. EPA - Region V (5HS-11)  
230 S. Dearborn St.  
Chicago, IL 60604

Re: Response to Supplemental Request for Information  
Pursuant to Section 104(e) of CERCLA and Section 3007 of  
RCRA for Southeast Rockford Groundwater Contamination  
Site in Rockford, Illinois, Dated March 11, 1991

Dear Ms. Vendl:

This letter is written in response to the above-referenced Supplemental Request for Information ("Supplemental Request") with respect to the Southeast Rockford Superfund Site (the "Site"). It is Sundstrand's goal to respond fully and truthfully to any letters demanding information. Sundstrand has demonstrated good faith by our letter of March 15, 1991 responding to inquiries which you raised during our November 29, 1990 meeting with respect to Sundstrand's prior information response of July 24, 1990. Sundstrand has always endeavored to respond fully and truthfully to each and every question in the various information requests. We believe that any past misunderstandings which arose can be attributed to differences in interpretation of the language of the requests.

Our March 15, 1991 letter was mailed before receipt of the Supplemental Request; based on conversations with Elizabeth Doyle of the Regional Counsel's office, it is apparent that much of the information provided in Sundstrand's March 15 letter may be directly responsive to your latest inquiry.

Mindful of the importance of your investigation, Sundstrand has expended an extraordinary effort in preparing this response. Sundstrand's responses to the USEPA's Supplemental Request are as follows:

1. Persons answering these questions on behalf of respondent are Linda Aylward, Environmental Counsel, and Ricardo Pringle, Senior Associate Attorney, in consultation with Jim Barry, Director of Aerospace Facilities Engineering and Services; Al Munn, Environmental Health and Safety Manager; Mark Chiado, Manager, Environmental Planning and Auditing; and Bob Miller, Director, Environmental Affairs. The aforementioned persons are all current employees of Sundstrand. See Sundstrand responses dated April 27, 1989 and July 24, 1990 for additional names of persons consulted in preparation of Sundstrand's previous responses.

2. Persons consulted in the preparation of this response include the following: Bill Coole; Bob Miller; Al Munn; Mark Chiado; Jim Barry; Mike Klockenga; Jack Johnson; Bob McKinney; and Bill Benton. Those documents consulted in preparation of this response are either attached or, if submitted with our prior 104(e) responses, listed in attachment 1.

3.    **A.    1984 TOLUENE RELEASE**

- (a)   November, 1984.
- (b)   The release was from a concrete underground spill containment unit.
- (c)   This occurrence took place when the vaporizer in an organic rankin cycle unit near the southeast corner of Plant 6 was taken out of service and emptied of toluene in anticipation of pick-up and disposal [Exhibit A(c)1 and A(c)2].
- (d)   An estimated 600-800 gallons of toluene were released.
- (e) - (g) The National Response Center ("NRC"), the Illinois Environmental Protection Agency ("IEPA"), and local authorities were contacted on December 7, 1984. An immediate soil removal and an investigation of the extent of the release was immediately initiated. A remedial action program was initiated in 1986, and a toluene and VOC stripping tower has been

operating since that time [Exhibits A(e)1, A(e)2, A(e)3 and A(e)4].

In March, 1986, the toluene and VOC stripping tower was installed with two operating purge wells. This groundwater cleanup system is the subject of ongoing monitoring. Annual reports to the IEPA have been submitted with respect to the operation of the tower. Attached are copies of those annual reports from 1986 to 1989. The 1990 report will be forwarded when it is completed. In 1987, a third purge well was installed to capture and treat affected groundwater along the western border of the Sundstrand Plant 6 property [Exhibit A(e)4].

- (h) Jim Carlson, Bill Coole, Jack Johnson, Jim Barry, Bill Johnson, Mark Chiado, Al Munn, John Buford and Larry Myers (all present employees); and Leo Keenan, Bernie Kittle, Dave MacMorris, Arnie Havens, Ron Waxler, Jim Jacob and Don Burchard (all former employees).<sup>1</sup>

**B. DURING EVALUATION OF THE EXTENT OF THE TOLUENE RELEASE IN A. ABOVE, ADDITIONAL COMPONENTS WERE DISCOVERED IN GROUNDWATER ANALYSES, PLANT 6**

- (a) The discovery of the additional materials took place in early 1985.
- (b) It is unknown how or if any release occurred from the areas described in Section B(e) below [Exhibit B(b)1].

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<sup>1</sup> To fully determine those who "were aware of such spills or releases" [quoting from the 104(e) request], Sundstrand would have to undertake the burdensome task of interviewing each employee of Plants 6 and 8. Instead, Sundstrand has reasonably identified those who, in accordance with Sundstrand's best information and belief, played substantive roles in reporting the spills and releases identified herein, or in managing or otherwise handling Sundstrand actions on each matter. Due to Sundstrand's policy on confidentiality of personal records, residential addresses have not been provided. However, all current employees can be contacted through Sundstrand Corporate Offices at 4949 Harrison Avenue, P.O. Box 7003, Rockford, Illinois 61125-7003.

- (c) Sundstrand has not determined if any other releases occurred, other than those reported in Section A and C through Q of this response.
- (d) See each individual description of occurrences listed in Section (e) - (g) below. The materials consisted of 1-1-1 trichloroethane, tetrachloroethylene, trichloroethylene, 1,1 dichloroethylene.
- (e) - (g) The NRC was notified of the discovery of the potential releases of materials other than toluene on March 20, 1985 [Exhibit B(b)1]. The investigation for the extent of the solvents listed above as well as toluene on site continued to 1989, when the findings culminated in a report by EDI, a former consultant for Sundstrand. This report was previously submitted to the EPA as a part of the 104(e) response package in 1990 and the supplemental response in 1991. See Attachment 1.

As Mr. Coole's letter sets out, there were three areas which were evaluated as additional potential sources [Exhibit B(e)1]. The first area was the waste sump area located near the tank farm. In evaluating the tank farm area, it was determined that there may possibly have been releases of unknown quantities of waste associated with this sump. As part of an overall program to remove underground storage tanks at Plant 6, this waste sump and associated piping was removed. Any associated soils which may have exhibited concentrations of materials are now the subject of the soil pile closure plan submitted to the IEPA on March 7, 1991. Attached is a copy of that closure plan for reference.

The second area of potential releases investigated was the Program Test Area trenches. This trenching area is an extensive network of concrete trenches which extend under and around the machine areas. This trenching area was steam cleaned and relined with an epoxy sealant at a cost of approximately \$100,000. No soil borings or samples were taken at the time, given that this trench intermittently routed low volumes of materials to waste tanks, and it appeared that the cracks in the trench were surficial.

The third area of potential releases investigated was three underground storage tanks located under a single test area in Plant 6. The capacity of the three tanks were as follows:

Waste Stoddard	1,000 gallons
Waste 1-1-1 trichloroethane	1,000 gallons
Waste oil	1,000 gallons

These tanks were investigated and removed in 1986. Visually contaminated soil was removed to the extent possible while still retaining the structural integrity of the building. Attached are copies of soil analyses, for the 98-55 gallon drums which were disposed [Exhibit B(e)2].

- (h) Bill Coole, Mark Chiado, Al Munn and John Buford (current employees); Alan Sedmak (deceased); and Bernie Kittle, Dave MacMorris, Curt Rosser, Joe McCarthy, Don Burchard, Jim Jacob and Leo Keenan (all former employees).

**C. AFTERBURNER PIT<sup>2</sup> - PLANT 8**

- (a) The release took place intermittently between approximately 1966 and 1978.
- (b) Waste water with possible traces of hydrazine and solvents occasionally overflowed from an afterburner pit to a field south of Plant 8. The materials in the afterburner pit were fed to an afterburner.
- (c) South of Plant 8. See attached map for area [Exhibit C(c)1].
- (d) Possible traces of hydrazine and solvents. Amounts are unknown.
- (e) - (g) A 10,000 gallon waste tank was installed in 1978 to control further overflows. At the time, a report of the release was not made because there was no

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<sup>2</sup>This was previously reported as a "settling pit" in Attachment 3, p.2 of Sundstrand's July 24, 1990 response to the Supplemental 104(e) Request. The Plant 8 facility was constructed in 1966.

regulatory requirement to do so. Some soils were removed at the time and disposed properly.

- (h) Bill Brown, Bill Gross, Don Burchard and Joe Vavra (all former employees).

**D. AFTERBURNER PIT - PLANT 8**

- (a) May, 1979.
- (b) The afterburner pit at Plant 8 overflowed such that the waste oil and water tank was bypassed.
- (c) South of Plant 8.
- (d) Possible traces of hydrazine and solvents in water overflowed. Amounts are unknown.
- (e) - (g) The pit was scheduled to be pumped out on a regular basis to prevent its overflow in the future. At the time, a report of the release was not made because there was no regulatory requirement to do so. A Letter Report is being prepared for the IEPA by Harding Lawson Associates ("HLA") to assess the nature and extent of organic chemicals detected in soils. This report, which is due to the IEPA on April 26, will be forwarded to USEPA at that time.
- (h) Don Burchard, Joe Vavra, and possibly Bill Brown and Bill Gross (all former employees).

**E. JP-4 TANKS AT PLANT 8**

- (a) The discovery of the release took place in July, 1990.
- (b) Upon removal of 2 JP-4 tanks, one was discovered to have leaked JP-4.
- (c) The release took place at Plant 8 into a 3 sided concrete containment bunker. This bunker floor sloped to a sump for collection of any releases. The JP-4 appeared to be contained within the bunker area.
- (d) The quantity of JP-4 so released is unknown.

- (e) - (g) Discovery of the release was reported to the NRC and IEPA. Attached is the August 3, 1990 follow up report [Exhibit E(e)1]. Soils were removed and a double lined replacement tank was installed with leak detection.
- (h) Jim Barry, Al Munn, Mark Chiado, Bob Miller, Linda Aylward, Mike Davis, Jeff Lindstrom and Al Hufford (all current employees).

**F. SULFURIC ACID LEAK, PLANT 6**

- (a) A release took place during the 1970's, the exact date is unknown.
- (b) A leak of sulfuric acid took place from a pipe at Plant 6.
- (c) Plant 6, underground sulfuric acid line leading to a cooling tower.
- (d) The quantity of sulfuric acid released is unknown.
- (e) - (g) The material was neutralized with soda ash. There exists no documentation on this release but it was reported in Sundstrand Attachment 3, Page 4 of the July 24, 1990 response to the USEPA Supplemental Request for Information. This release was not reported because there was no regulatory requirement to do so at the time of the incident.
- (h) Jerry Henrickson. Sundstrand is still attempting to identify additional employees with knowledge about this release.

**G. EXHAUST COLLECTION TANK, PLANT 8**

- (a) September, 1983.
- (b) The exhaust collection tank overflowed into the storm water collection system.
- (c) Plant 8, inside the facility.
- (d) The tank contained either hydrochloric acid or potassium hydroxide. The quantity released is unknown.

(e) - (g) Follow up testing indicated that the material did not reach the storm drain system [Exhibit G(e)1]. A report was not made to the NRC because there was no release into the environment.

(h) Owen Briles, Jack Johnson, Frank Granstra, (all current employees); and Len Grunow, Wilson Leeming and Ron Waxler (all former employees).

**H. RELEASE OF STODDARD SOLVENT, PLANT 6**

(a) March 12, 1985 to March 19, 1985.

(b) The release occurred in a leaking transfer pipe under the floor, in a trench in Plant 6.

(c) Under the Plant 6 floor, in a trench.

(d) 400 gallons of 100% Stoddard Solvent was released.

(e) - (g) The release was reported to the Sanitary District of Rockford on March 20, 1985. See attached Accidental Discharge Reporting Form [Exhibit H(e)1]. The pipe was capped and removed from service.

(h) Bill Benton, Al Munn, Jack Johnson (all current employees); and Don Burchard (former employee).

**I. TANK #12, PLANT 6**

(a) April 1, 1987.

(b) Pump #12 failed and thus probably caused the solvent to collect and drain into both of the waste tanks.

(c) In Plant 6.

(d) Approximately 950 gallons of perchloroethylene were recovered in the north and south waste tanks. Sundstrand believes that the perchloroethylene tank only held approximately 950 gallons at the time of the release.

(e) - (g) The tank was removed. Given that this material was captured, no report was made to the NRC. See



attached internal memo dated April 6, 1987 [Exhibit I(e)1].

- (h) Al Munn, Jeff Lindstrom, Mike Klockenga, Bill Benton, Bob McKinney and, Mark Chiado, (all current employees).

**J. SOIL PILE - PLANT 6**

- (a) The discovery was made during the spring of 1990.
- (b) During the removal of two underground storage tanks which were discovered to be leaking in the tank farm area, a soil pile was created as an interim step to proper disposal.
- (c) Plant 6, tank farm area east of the building.
- (d) Solvents at varying levels were detected in the soils.
- (e) - (g) A closure plan for treatment and disposal of the soils was submitted to IEPA on March 7, 1991. The plan detailed the proposed clean-up of soils resulting from those leaking underground storage tanks within the tank farm. As can be seen in the attached soil pile schedule of events [Exhibit J(e)1], soils were sampled, and a decision was made to file a Part A RCRA permit and a closure plan. See Exhibits J(e)2 and J(e)3. Sundstrand is currently awaiting IEPA approval of the closure plan.
- (h) Al Munn, Jim Barry, Jeff Lindstrom, Jim Eckroth, Mark Chiado, Bob Miller, Linda Aylward, Mike Davis, Ed Laprade, Bill Coole, (all current employees).

**K. 10,000 GALLON WASTE TANK, PLANT 8**

- (a) This release was discovered in July, 1990.
- (b) The 10,000 gallon waste tank overflowed at the manway access into a concrete containment area. The waste material may have escaped beneath the concrete retaining walls.
- (c) The release occurred at the Plant 8 afterburner pit. (See items C and D above).

- (d) The amounts are unknown of the waste water and oil which was released.
- (e) - (g) A report of release was made on July 12, 1990 to the NRC. All visually stained backfill was removed from the containment area immediately following the release. See Exhibit K(e)1 for the follow up report to the IEPA.
- (h) Al Munn, Jim Barry, Jeff Lindstrom, Jim Eckroth, Mark Chiado, Bob Miller, Linda Aylward, Mike Davis, Bill Coole, (all current employees).

**L. COOLING TOWER RELEASE, PLANT 8**

- (a) The release was discovered in late 1989 or early 1990.
- (b) An underground leak associated with the Plant 8 cooling tower resulted in a release of non-hazardous ethylene glycol to the environment.
- (c) The release took place near the cooling tower south of Plant 8.
- (d) An unknown quantity of ethylene glycol was released.
- (e) - (g) Upon discovery of soil with a "pinkish" color, samples were taken and the color was attributed to the ethylene glycol from the Plant 8 cooling tower. Visually stained soils were removed and disposed. No report was made to the NRC because the material released was not listed as a hazardous substance.
- (h) Al Munn, Jim Barry, Bill Benton, Jeff Lindstrom, Mark Chiado (all current employees).

**M. LEADED GASOLINE LEAK, PLANT 6**

- (a) 1987 or 1988.
- (b) A pump on an underground leaded gasoline fuel tank leaked.
- (c) The pump and tank were located near the boiler room for Plant 6.

- (d) The quantity released of the leaded gasoline is unknown.
  - (e) - (g) The visually stained soils were removed and disposed. The tank and the pump were removed. No report was made to the NRC as gasoline is not a hazardous material and thus not subject to requirement for reporting.
  - (h) Al Munn, Mark Chiado, Jeff Lindstrom (all current employees).
- O. COOLING TOWER SULFURIC ACID RELEASE, PLANT 6**
- (a) June, 1989.
  - (b) Sulfuric acid was released from the cooling tower onto the ground.
  - (c) The release took place at the Plant 6 cooling tower.
  - (d) 10 gallons of sulfuric acid was released.
  - (e) - (g) The sulfuric acid was immediately neutralized with crushed limestone and water. See attached Hazardous Material Incident Report [Exhibit O(e)1]. No release to the soil occurred and no report to the NRC was made.
  - (h) Jeff Lindstrom, Al Munn, Jim Barry, Jim Eckroth (all current employees).

- P. 1-1-1 - TCA EXPLOSION, PLANT 6**
- (a) September, 1990.
  - (b) A contractor's employee was blow torching an empty tank when there was an explosion, a small amount of TCA condensed, and escaped the tank in liquid form.
  - (c) Plant 6.
  - (d) Very small quantities of 1-1-1 TCA condensed and escaped the tank at the time of the explosion.
  - (e) - (g) The area was cleaned with absorbent booms and pads. A report was made, and the local hazardous

materials emergency response from the Rockford Fire Department came to the plant and plugged the tank. There did not appear to be a release to the environment.

- (h) Al Munn, Jeff Lindstrom, Jim Barry, (all current employees).

**Q. SILVER CYANIDE SOLUTION RELEASE, PLANT 6**

- (a) March 15, 1984.
- (b) The plastic bottle in which the silver cyanide solution was stored developed a leak.
- (c) Materials Lab Storage Room, Plant 6.
- (d) Approximately 2 quarts diluted by up to 2 gallons of water to 100 ppm was released.
- (e) - (g) The bottle was placed into a glass beaker, and the spilled material was washed up with a gallon pail. A report was not made to the NRC because the entire spill was contained and immediately cleaned up. See Exhibit Q(e)1 for a report to the Rockford Sanitary District. The spill was slowly flushed with large quantities of water to the sanitary sewer.
- (h) Al Munn and Jeff Lindstrom, (current employees).

Additionally, you asked for reports, memoranda, information or data relating to investigations including but not limited to HLA reports for Phase 1 and Phase II. To date, HLA has not produced any reports for investigation of groundwater conditions with the exception of the brief description of the results of the soil gas sampling which took place in October, 1989. See Attachment 1. HLA is currently preparing an analysis of the groundwater conditions at and adjacent to Sundstrand's Plant 6 facility. The final report will be forwarded to you upon its completion.

Sundstrand reserves the right to modify or amend this response at any time additional information may be discovered concerning any of these matters. This response should not be construed as an admission of liability on the part of Sundstrand, nor should the material supplied herein be construed as an


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admission of wrong-doing or evidence of violation of any federal,  
state or local statute or ordinance.

If you have any questions with respect to this response,  
please contact me at (815) 226-6880 or Robert Miller at (815)  
226-2755.

Very truly yours,

SUNDSTRAND CORPORATION

  
Linda S. Aylward  
Environmental Counsel

LSA:tky  
Encls.

cc: Robert Miller  
William Coole  
Elizabeth Doyle

## ATTACHMENT 1

List of documents previously submitted to the USEPA:

1. Results of Hydrogeologic Evaluation for Sundstrand Corporation, August, 1989, Project 20557, submitted on July 24, 1990 and on March 15, 1990.
2. HLA Work Plan and Report, October 25, 1989, Attachment No. 9, in July 24, 1990 Response.

## TABLE OF EXHIBITS

A(c)1	Map of Sundstrand Rockford locations
A(c)2	Map of Harrison/Alpine locations
A(e)1	Office memorandum dated June 24, 1987 from Al Munn and attached June 24, 1989 letter to IEPA and Sundstrand Advanced Technology Group (ATG) letter dated August 31, 1990 to Kerry Keller (IEPA)
A(e)2	IEPA letter dated May 15, 1985 to Bill Coole
A(e)3	Sequence of Events - August 30, 1984 to December 19, 1984
A(e)4	Sundstrand Corporation letter dated July 24, 1985 to IEPA from William R. Coole
B(b)1	Sundstrand letter dated April 4, 1985 to USEPA from Bill Coole; Sundstrand letter dated March 20, 1985 to the IEPA from Bill Coole
B(e)1	Plant 6 Water and Soil Contamination Investigation - Source Elimination Proposal - Prepared by Al Munn dated August 27, 1986
B(e)2	CBC-AquaSearch Laboratory Report dated June 26, 1986
C(c)1	Overhead photograph South of Plant 8 (#119930-3)
E(e)1	Sundstrand ATG letter dated August 3, 1990 to IEPA from Al Munn
G(e)1	Memo dated September 2, 1983 to Leonard Grunow from Owen Briles
H(e)1	Sanitary District of Rockford Accidental Discharge Reporting Form
I(e)1	Office memorandum dated April 6, 1987 to Jim Barry from Jeff Lindstrom
J(e)1	Soil Pile Schedule of Events
J(e)2	HLA Closure Plan (Plant 6 Soil Pile) Sundstrand Project No. 5-8255
J(e)3	HLA Summary Report Plant 6 Facility Tank Farm Area Investigation
J(e)4	Sundstrand ATG letter dated July 14, 1990 to IEPA from Al Munn

- K(e)1 Sundstrand ATG letter dated August 31, 1990 to IEPA from Al Munn
- O(e)1 Hazardous Materials Incident Report dated June 29, 1989
- Q(e)1 Sanitary District of Rockford Accidental Discharge Reporting Form